

Sea-Level Rise Inquiry

Tom Adler [REDACTED]

Wednesday, November 27, 2013 3:29 PM

All,

I have read the draft guidelines for sea level rise. The document is thoughtful and well written. My comments are made in an effort to better coordinate a complex issue.

- Is this the time to address the disconnect between FEMA FIRM maps and sea level rise? I have been told by FEMA that the rate maps are for an insurance program and therefore they do not want to speculate sea level rise. Page 32 of the draft guidelines begins to show the fallacy of this argument: *"The number of people living in areas exposed to flooding from a 100-year flood is estimated to increase by 67%"* By not providing accurate maps based on science we are in danger of bankrupting the insurance program. FEMA is in the process of updating the California coast mapping right now and is losing the opportunity to identify these areas. Maybe this Draft guideline could be revised to address the issue by saying "For all tidally influenced areas, add 65.76 inches to the FEMA water surface level for a conservative view of what the FEMA map will look like in 2100."
- The Regional Water Quality Control Board calls silt a pollutant. Under "Establish a Sea-Level Rise planning and research program" (Page 54) I proposed we develop policies to legally allow the sand from our mountains to replenish the beaches as they have since the beginning of time.
- With sea level rise, won't the boundary of the tidelands trust move east? Should we set the ground rules now so we can avoid arguments of "Takings" in the future? A dynamic mean high tide line might be too difficult to implement, maybe a sphere of influence type approach in the OPR guidelines for general plans?
- Page 26, Section 13 speaks to lifetime mitigation measures however, there should be some credit for new subsurface habitat created over the life of the project. For example, dry beach today, once underwater, provides potential eel grass areas.
- The document is word heavy and picture light. Might we place some good and bad example graphics to better convey what is desirable behavior.

Thanks,

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